

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF )  
ILLINOIS )

Petition for Certificate of Public Convenience )  
and Necessity for Ameren Transmission Co. )  
of Illinois Pursuant to Section 8-406.1 of )  
of the Illinois Public Utilities Act, to construct )  
operate and maintain a new high voltage )  
electric service line and related facilities )

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Docket Number 12-0598

**PETITION TO INTERVENE**

NOW COMES, Illinois Laborers' and Contractors' Training Trust Fund (as hereinafter referenced and as listed in the Petition as "Illinois Laborers' & Contractors"), by their attorneys, Cavanagh & O'Hara LLP, and in support of its Petition to Intervene pursuant to the Rules of Practice of the Illinois Commerce Commission (83 Ill. Admin. Code 200.200) in the above-entitled matter, states as follows:

1. A Petition was filed by Ameren Transmission Company of Illinois herein initiating this proceeding on November 7, 2012.

2. The Petition herein seeks approval from the Illinois Commerce Commission ("Commission") for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott, and Shelby, Illinois.

2. Illinois Laborers' & Contractors is a landowner in Brown County Illinois, and has an interest in the real estate that will be substantially affected by the primary route of the proposed Illinois Rivers Transmission Line.

3. Accordingly, Illinois Laborers' & Contractors seeks to intervene and be treated as an active party to this proceeding in order to formally protect its interests in this matter.

4. The Illinois Laborers' & Contractors agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. Such service shall be made upon the attorneys of record for Illinois Laborers' & Contractors.

5. Illinois Laborers' & Contractors is prepared to accept and does accept the record and procedural schedule established to date in this docket.

WHEREFORE, Illinois Laborers' & Contractors, respectfully request that it be permitted to intervene herein as an active party to this proceeding.

Respectfully submitted,

Illinois Laborers' and Contractors' Training  
Trust Fund, by and through its attorneys,

  
\_\_\_\_\_  
John T. Long  
Tim Shrake

Cavanagh & O'Hara LLP  
John T. Long  
Tim Shrake  
407 East Adams Street  
P.O. Box. 5043  
Springfield, Illinois 62701  
[johnlong@cavanagh-ohara.com](mailto:johnlong@cavanagh-ohara.com)  
[timshrake@cavanagh-ohara.com](mailto:timshrake@cavanagh-ohara.com)

STATE OF ILLINOIS                    )  
  ) SS  
COUNTY OF SANGAMON                )

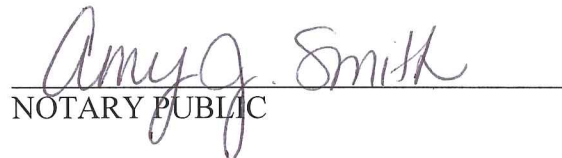
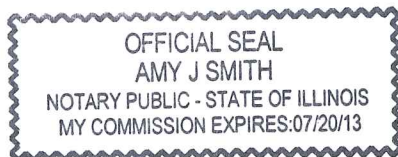
**VERIFICATION**

John T. Long, being first duly sworn, deposes and says he is one of the practicing attorneys in the firm of Cavanagh & O'Hara LLP and one of the attorneys for Illinois Laborers' and Contractors' Training Trust Fund, and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above and foregoing document, has knowledge of the facts stated herein and herewith states that the matters set forth are true in substance and in fact.



John T. Long  
Cavanagh & O'Hara LLP  
John T. Long  
Tim Shrake  
407 East Adams Street  
P.O. Box. 5043  
Springfield, Illinois 62701  
[johnlong@cavanagh-ohara.com](mailto:johnlong@cavanagh-ohara.com)

Subscribed and sworn to before me, a Notary Public, on this 11 day of December,  
2012.

  
NOTARY PUBLIC

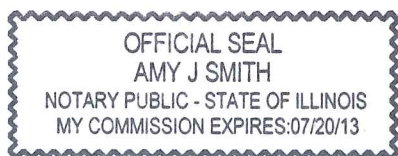
**CERTIFICATE OF SERVICE**

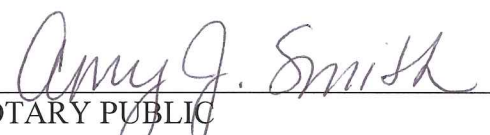
STATE OF ILLINOIS                    )  
  ) SS  
COUNTY OF SANGAMON            )

I, John T. Long, being an attorney admitted to practice in the State of Illinois and the attorney for Illinois Laborers' and Contractors' Training Trust Fund herewith certify that I did on the 11<sup>th</sup> day of December 2012, electronically file with the Illinois Commerce Commission, a Petition to Intervene on behalf of Illinois Laborers' and Contractors' Training Trust Fund, and electronically served the same upon the persons identified on the Commission's official service list.

  
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John T. Long  
Cavanagh & O'Hara LLP  
John T. Long  
Tim Shrake  
407 East Adams Street  
P.O. Box. 5043  
Springfield, Illinois 62701  
[johnlong@cavanagh-ohara.com](mailto:johnlong@cavanagh-ohara.com)

Subscribed and sworn to before me, a Notary Public, on this 11 day of December, 2012.



  
\_\_\_\_\_  
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